

May 25, 2005

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

RE: Bay State Gas Company, D.T.E. 05-27

Dear Ms. Cottrell:

Enclosed, please find the New England Gas Company's ("Company") Petition Requesting Limited Participant Status in the above captioned proceeding. As the Petition states, the Company has consulted with Bay State Gas Company and is able to represent in this filing that Bay State has no objections to our participation in this proceeding.

Thank you for your attention in this filing. Please feel free to contact me directly at (401) 272-5040, extension 2212, with any questions.

Sincerely,



Kevin F. Penders, Esq.
Manager, Regulatory Relations

Enclosures

cc: Andrew O. Kaplan, General Counsel
John Cope-Flanagan, Assistant General Counsel
Caroline M. Bulger, Hearing Officer
Patricia M. French, NiSource
Robert L. Dewees, Jr., Nixon Peabody, LLP
Karlen J. Reed, Assistant Attorney General
Alexander J. Cochis, Assistant Attorney General
Colleen McConnell, Assistant Attorney General
Angela M. O'Connor, Associated Industries of Massachusetts
Cheryl M. Kimball, Keegan Werlin, LLP
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Dte.efiling@state.ma.us (electronic version only)

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Bay State Gas Company)
_____))
_____)

D.T.E. 05-27

**PETITION OF NEW ENGLAND GAS COMPANY REQUESTING LIMITED
PARTICIPANT STATUS**

Pursuant to 220 C.M.R. § 1.03, New England Gas Company ("Company") hereby petitions the Department of Telecommunications and Energy ("Department") to participate in the above-captioned proceeding as Limited Participants. In support of its petition, the Company states the following:

1. The Company is the New England operating division of Southern Union Company. The Company is a Massachusetts gas company, as defined in G.L. c.164, § 1, provides retail service in Massachusetts through its Fall River and North Attleboro service areas and is subject to the regulatory jurisdiction of the Department.
2. The Company's usual place of business is:

New England Gas Company
100 Weybosset Street
Providence, Rhode Island 02903
3. On April 27, 2005, Bay State Gas Company ("Bay State") filed with the Department a petition pursuant to G.L. c. 164, §94, and 220 C.M.R. §§ 5.00 et seq., requesting a rate increase for firm gas customers seeking additional annual

revenues of approximately \$22.2 million. The Department docketed the petition as D.T.E. 05-27.

4. In conducting adjudicatory hearings, the Department “may allow any person showing that he may be substantially and specifically affected by the proceeding to intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any other limited purpose,” as the Department may order.

G.L. c. 30A, § 10(4); 220 C.M.R. § 1.03(1)(b).

5. The Department’s investigation in this proceeding may raise substantial ratemaking and related issues that are common to other gas companies in Massachusetts, including the Company.
6. In addition, good cause exists for allowing this petition because: (1) the procedural conference for the proceeding has not yet been held; (2) the Company’s Limited Participant status will not jeopardize the efficiency of the Department’s investigation in any material way; and (3) counsel for the Company has contacted counsel for Bay State concerning its interest in this case and can represent that Bay State does not object to the Company being granted Limited Participant status.
7. Accordingly, the Company seeks to participate in this proceeding as a Limited Participant with rights to receive copies of all pleadings, discovery requests and responses and to file brief(s) in accordance with the procedural schedule to be established by the Department.

WHEREFORE, for the reasons stated above, New England Gas Company respectfully requests that this Petition to Participate as a Limited Participant in the above-referenced proceeding be granted. The Company hereby notices the appearance of the undersigned counsel. Please send one copy of all notices, testimony, pleadings and correspondence pertaining to this proceeding to counsel as shown below.

Respectfully submitted,

NEW ENGLAND GAS COMPANY

By Its Attorney,

A handwritten signature in dark ink, appearing to read "Kevin F. Penders", is written over a horizontal line.

Kevin F. Penders
New England Gas Company
100 Weybosset Street
Providence, Rhode Island 02903
(401) 272-5040 x 2212 (phone)
(401) 751-0698 (fax)

Date: May 25, 2005